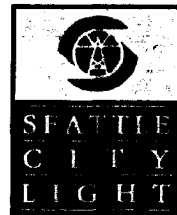


SA



Randall W. Hardy, Superintendent  
Charles Royer, Mayor

DATE: March 27, 1989

TO: Charles Weems

FROM: Shirli Axelrod *SA*

SUBJECT: Specification 2928, Receipt of Manifests Prior to  
Acceptance of Work at Georgetown Steam Plant

As you know, PCB-contaminated material was removed from two of the underground tanks at the Georgetown Steam Plant by Wilder's subcontractor, GL Construction. This waste was contained in drums and transported to the Envirosafe Services hazardous waste facility in Grandview, Idaho, for disposal. City Light required the completion of a Uniform Hazardous Waste Manifest for this disposal, because of hazardous waste transportation and disposal laws.

The manifest provides a record of the handling of the waste, and a copy will be returned to City Light from the disposer as proof they received the waste. Also, City Light must prepare reports annually to the EPA documenting all PCB disposal of during each year. The returned copy of the manifest is necessary for our report. Thus, the contractor's work is not complete until City Light receives documents tracking the waste.

Retaining a significant portion of payment until proper disposal is documented is a standard part of City Light's PCB disposal contract administered by Materials Management: only 50 percent of the invoiced amount is paid until we receive certificates of disposal.

This is an important accountability tool for City Light, because our liability for improper handling and disposal of PCBs would be great. I recommend you do not give the Board of Public Works your acceptance of the contractor's work until you receive the return copy of the manifest. I recommend the contractor not get paid the total for the disposal until the manifest is returned to City Light.

Please let me know your decision on this matter. Thank you.

SA:bal

cc: Summers  
Best/Axelrod  
EAD 960/File

*talk to  
Mike Brown*

SCL 04235

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